

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

**JUSTIN M. MALIK and
LAURA L. McKEE,**

Debtors

**JUSTIN M. MALIK and
LAURA L. McKEE**

Movants

v.

GREEN TREE MORTGAGE,

Respondent

:
: **BK. No. 15-22990-GLT**
:
: **Chapter No. 13**
:
: **Document No. 150**
:
: **Hearing Date: 7/20/16**
:
: **Hearing Time: 10:00 AM**
:
:
:

**RESPONSE OF DITECH FINANCIAL LLC F/K/A GREEN TREE SERVICING LLC
TO THE DEBTORS' MOTION TO SELL REAL ESTATE
FREE AND CLEAR OF ALL LIENS, CLAIMS AND ENCUMBRANCES**

Respondent, Ditech Financial LLC f/k/a Green Tree Servicing LLC (hereinafter "Ditech"), by and through its attorneys, Phelan Hallinan & Diamond & Jones, LLP, hereby responds to the Debtors' Motion to Sell Real Estate Free and Clear of Liens, Claims and Encumbrances and in support thereof, avers as follows:

1. The Debtors' Motion for Sale proposes to sell the interest of the Debtor, Laura L. McKee in the real estate located at 4034 Pinehurst Drive, Morgantown, Monongalia County, West Virginia, 26505, free and clear of liens.
2. Ditech holds a mortgage on this real property as set forth in the Proof of Claim filed in this case at claim number 7-1. Ditech objects to the sale unless the proceeds of the sale are sufficient to pay the secured claim of Ditech in full.

WHEREFORE, Respondent, Ditech Financial LLC f/k/a Green Tree Servicing LLC, respectfully requests that this Honorable Court deny the Trustee's Motion to Sell Real Estate Free and Clear of Liens.

Respectfully submitted,

Date: 7/19/16

/s/ James A. Prostko, Esquire

James A. Prostko, Esq., Id. No.27221

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CERTIFICATE OF SERVICE

I certify under penalty of perjury that on July 19, 2016, I served the Response of Ditech Financial LLC, to the Debtors' Motion to Sell Real Estate Free and Clear of Liens, on the parties at the addresses shown below. The types of service made on the parties were: Electronic Notification and First Class Mail.

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